

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID REID, et al.,

Defendants.

Case No.: CR05-1849 JH

(EXPEDITED RULING REQUESTED)

**UNOPPOSED MOTION BY DEFENDANT DAVID REID TO
BE PERMITTED TO TRAVEL OUT OF STATE**

Defendant, David Reid, by and through undersigned counsel, hereby moves this Honorable Court to enter an Order permitting him to travel out of the state of Arizona from May 24, 2006 to June 11, 2006. The grounds for this Motion are:

1. Pursuant to the current terms and conditions of release, Mr. Reid is prohibited from traveling out of the state of Arizona unless approved by the Court.
2. Mr. Reid would like to travel to Newburg, Oregon from May 24, 2006 to June 11, 2006 to assist his daughter, Delilah, who was involved in a serious motor vehicle accident approximately five months ago. While in Oregon, Mr. Reid will also be providing business services for Dormer's Screenprinting. Finally, Mr. Reid's appearance is required on June 6, 2006 before the Yamhill County Circuit Court in case number SC060391, in order to defend himself against a small claims court lawsuit over a rental property.

3. Undersigned counsel contacted Assistant United States Attorney General James Braun on May 17, 2006 and he stated that he has no objection to Mr. Reid's request.

4. Undersigned counsel contacted Mr. Reid's assigned Pre-trial Services Agency Officer in New Mexico, Nick Romero, on May 17, 2006 and he stated he has no objection to Mr. Reid's request.

5. Undersigned counsel contacted Mr. Reid's assigned Pre-trial Services Agency Officer in Arizona, Suzette Frisby, on May 17, 2006 and she stated that she has no objection to Mr. Reid's request so long as he calls her before his departure and upon his arrival.

Based on the foregoing, Mr. Reid requests this Honorable Court enter an Order permitting him to travel to Oregon from May 24, 2006 to June 11, 2006.

RESPECTFULLY SUBMITTED this 18th day of May, 2006.

/s/ electronically signed

ZUBAIR ASLAMY
Attorney for Defendant Reid
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Tempe, Arizona 85282
(480) 968-8700

I hereby certify that a true and correct copy of the foregoing was filed electronically with the court and faxed to the Assistant United States Attorney and mailed to the following this 18TH day of May, 2006.

/s/ electronically signed

Nick Romero
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Suzette Frisby
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